

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

ANITA RUSSELL, Personal	)	
Representative for the Estate	)	
of Daniel Russell,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:11-cv-00075-GEC
	)	
DENNEY WRIGHT, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT TASER INTERNATIONAL, INC.'S**  
**AMENDED TRIAL EXHIBIT LIST**

Defendant TASER International, Inc. lists the following exhibits which may be offered at trial:

Exhibit #	Exhibit Description	Date Offered	Date Entered
300	3-1-07 TASER Product Warnings		
301	11-30-07 TASER Training Bulletin 13.0-12 – Release of Version 14		
302	12-1-07 TASER Training DVD Version 14		
303	Version 14 M26 & X26 Instructor PowerPoint with notes		
304	Version 14 M26 & X26 User PowerPoint with notes		
305	Version 14 Training Drills and Scenario-Based Training Procedures		
306	Version 14 Instructor Preparation Checklist		
307	Version 14 User Certification Checklist		
308	Version 14 Instructor and User Warnings, Risks, Liability Release and Covenant Note to Sue		
309	Version 14 User Certification Test		
310	4-28-08 TASER Training Bulletin 14.0-03 - Release of TASER Law Enforcement Warnings		

<b>311</b>	4-28-08 TASER Product Warnings		
<b>312</b>	8-24-09 TASER Training Bulletin 14.2-6 - Release of Training Version 15.0		
<b>313</b>	8-24-09 TASER Training DVD Version 15		
<b>314</b>	9-30-09 TASER Product Warnings		
<b>315</b>	9-30-09 TASER Training Bulletin 15.0 - Medical Research and New Warnings		
<b>316</b>	10-12-09 TASER Training Bulletin 15.0 V2 - Medical Research Update and Revised Warnings		
<b>317</b>	12-4-09 TASER Training Bulletin 15.1 - Release of Version 16.0		
<b>318</b>	12-7-09 TASER Training DVD Version 16		
<b>319</b>	Version 16 User PowerPoint with notes		
<b>320</b>	Version 16 User Power Point Slide 102 - Preferred Target Zone Front		
<b>321</b>	Version 16 User PowerPoint Slide 175 - Drills		
<b>322</b>	Version 16 Instructor Preparation Checklist		
<b>323</b>	Version 16 Instructor and User Warnings, Risks, Liability Release and Covenant Not to Sue		
<b>324</b>	Version 16 User Certification Checklist		
<b>325</b>	Version 16 Training Drills, Isolation Exercises, and Scenario-Bases Training Procedures		
<b>326</b>	Version 16 TASER Preferred Target Area Poster and Target Stand Instructions		
<b>327</b>	4-24-10 TASER Training Bulletin 16.1: Release of Version 17		
<b>328</b>	5-1-10 TASER Product Warnings		
<b>329</b>	5-1-10 TASER Training DVD Version 17		
<b>330</b>	Version 17 User PowerPoint with Notes		
<b>331</b>	Version 17 User PowerPoint Slide 121 - Preferred Target Zone Front		
<b>332</b>	Version 17 User PowerPoint Slides 22-24 - Cardiac		
<b>333</b>	Version 17 User Certification Checklist		
<b>334</b>	Version 17 Instructor Preparation Checklist		

<b>335</b>	Version 17 User Certification Checklist		
<b>336</b>	Version 17 Instructor and User Warnings, Risks, Liability Release and Covenant Not to Sue		
<b>337</b>	Version 17 Training Drills		
<b>338</b>	Version 17 Training Drill Targets		
<b>339</b>	TASER Communications report with Appomattox County Sheriff's Office		
<b>340</b>	10-30-10 911 Call from the Russell house		
<b>341</b>	10-30-10 Dispatch call		
<b>342</b>	TASER Data Download from X00-270066		
<b>343</b>	ACSO Response to Subpoena (ACSO-000001-00174)		
<b>344</b>	10-30-10 TASER Cam video		
<b>345</b>	ACSO General Orders Number:2-6 (Use of Force Policy) (ACSO-00022-00032)		
<b>346</b>	10-30-10 Deputy Wright's in-car video		
<b>347</b>	10-30-10 Deputy Mattox's in-car video		
<b>348</b>	10-30-10 ACSO - Dispatch Record		
<b>349</b>	Denney Wright's TASER X26 User X26 Certification Test (Version 14) (ACSO-00068-00072)		
<b>350</b>	4-26-10 Denney Wright's TASER Liability Release - signed		
<b>351</b>	3-28-07 Sean Burton's M26 and X26 Instructor Certification certificate (ACSO-00166)		
<b>352</b>	11-25-08 Sean Burton's M26 and X26 Instructor Certification certificate (ACSO-00167)		
<b>353</b>	10-31-10 Denney Wright's ACSO Use of Force Report (ACSO-00077-00078)		
<b>354</b>	Officers Mattox, Wright, Craft and Samms statements (ACSO-00084-00089)		
<b>355</b>	Statement of Rhett Russell (ACSO-00081-00083)		
<b>356</b>	Andrew Russell's signed statement regarding the incident. (ACSO-00147)		
<b>357</b>	10-30-10 ACSO Incident Report (Wright 00022-00027)		

<b>358</b>	11-13-12 Denney Wright's Declaration		
<b>359</b>	11-13-12 John Mattox's Declaration		
<b>360</b>	Photographs of Dep. Wright, indicating where the TASER probes landed		
<b>361</b>	10-30-10 Photographs (two) of Rhett Russell's injuries		
<b>362</b>	Warrant of Arrest against Daniel Russell arising over 10/20/10 incident. (ACSO-00139)		
<b>363</b>	Daniel Russell's previous criminal records and convictions (ACSO-00094-00106)		
<b>364</b>	Daniel Russell's 2006 Tax Return		
<b>365</b>	Daniel Russell's 2007 Tax Return		
<b>366</b>	Daniel Russell's 2008 Tax Return		
<b>367</b>	Daniel Russell's 2009 Tax Return		
<b>368</b>	Daniel Russell's 2010 Tax Return		
<b>369</b>	Fuller Cable Construction, LLC (TI-Russell-007479)		
<b>370</b>	JWS Communications (TI-Russell-007480)		
<b>371</b>	Lynchburg Restoration, Inc. (TI-Russell-007481-007658)		
<b>372</b>	Metro Pole Setting Company, Inc. (TI-Russell-007659-007660)		
<b>373</b>	O'Callaghan Cable Services Inc. (TI-Russell-007661-007678)		
<b>374</b>	PBS of Central Florida (TI-Russell-007679-007692)		
<b>375</b>	Anchor Sales, Inc. (TI-Russell-007693-007718)		
<b>376</b>	Campbell CATV, Inc. (TI-Russell-007456-007477)		
<b>377</b>	CC&J Tech, Inc. (TI-Russell-007478)		
<b>378</b>	Cardiovascular Associates of Charlottesville		
<b>379</b>	Pathways Treatment Center		
<b>380</b>	10-30-10 Rescue Squad Pre-Hospital Care Report		
<b>381</b>	Lynchburg General Hospital		

<b>382</b>	UVA Health Systems medical records		
<b>383</b>	Commonwealth of Virginia Office of the Chief Medical Examiner Report of Investigation		
<b>384</b>	AED Scan from Daniel Russell on 10/30/10		
<b>385</b>	Martha Jefferson Hospital medical records		
<b>386</b>	7-20-10 UVA Hospital Cardiac follow-up appointment (DR 10-000001-DR19-000036)		
<b>387</b>	Rio Family Medicine medical records		
<b>388</b>	Kroll, M. Panescu, D. Brewer, J., Lakkireddy, D., Graham, M. <i>Weight Adjusted Meta-Analysis of Fibrillation Risk From TASER Conducted Electrical Weapons</i> . AAFS 2009		
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<b>391</b>	Vilke, G., Sloane, C., Bouton, K., Kolkhorst, F., Levine, S., Newman, T., Castillo, E., Chan, T. <i>Physiological Effects of a Conducted Electrical Weapon on Human Subjects</i> . American College of Emergency Physicians. 2007.		
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<b>469</b>	(IEC) Effects of current on human beings and livestock: Part 2: Special aspects. AS/NZS 60479.2:2002. IEC 60479-2:1987. " [IEC title: Effects of current passing through the human body—Part 2: Special aspects] [Also see, Adler, Modern Instrumentation]		
<b>470</b>	(IEC) IEC 60335-2-76, edn 2.1: Household and Similar Electrical Appliances—Safety—Part 2—76: Particular Requirements for Electric Fence Energizers, 2006 (Geneva: IEC).		
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<b>472</b>	(AS/NZS) Effects of current on human beings and livestock: Part 2: Special aspects. AS/NZS 60479.2:2002. IEC 60479-2:1987. [IEC title: Effects of current passing through the human body—Part 2: Special aspects]		
<b>473</b>	(AS/NZS) AS3559•19131; IEC479-1 & IEC479-2 Australian Standard [IEC title: Effects of current passing through the human body]		
<b>474</b>	(BS) EN 60601-1:2006 Medical electrical equipment. General requirements for basic safety and essential performance. 2006 (including corrigenda up to March 2010).		
<b>475</b>	(UL) Standard for Electric-Fence Controllers, UL 69 10th edn (Northbrook, IL: UL Laboratories), 2009.		
<b>476</b>	Webster's Proposed Safety Test Standard (01/2009)		
<b>477</b>	5-30-12 Plaintiff's Responses to TASER's Requests for Admissions		
<b>478</b>	11-13-12 Denney Wright's Signed Declaration attached to his Motion for Summary Judgment.		
<b>479</b>	Grant Fredericks' synched video		
<b>480</b>	TASER Training Bulletin 14.2-01 -		
<b>481</b>	ACSO Incident Report (ACSO-00129-00131)		
<b>482</b>	ACSO Call Report for Call Type T16 (ACSO-00090-00091)		
<b>483</b>	ACSO Call Report for Call Type R73 (ACSO-00092)		
<b>484</b>	ACSO Incident Photographs (ACSO00148-00154)		

<b>485</b>	Typed Statement (ACSO 00135 to 00136)		
<b>486</b>	Incident Report (ACSO 00142 to 00146)		
<b>487</b>	Evidence Recovery Form (ACSO 00137)		
<b>488</b>	Notice of Vehicle Impoundment (ACSO 00138)		
<b>489</b>	911 Call Log (ACSO 00090 to 00091)		
<b>490</b>	911 Call Log (ACSO 00092)		
<b>491</b>	TASER Weapons Summary (ACSO 00001 to 00005)		
<b>492</b>	TASER Weapons Summary (supplemental production by ACSO)		
<b>493</b>	Rhett Russell EMT Report (Walton Deposition Exhibit 22)		
<b>494</b>	All Medical Records for Daniel Russell predating October 30, 2010 incident obtained by subpoena.		
<b>495</b>	All discovery responses produced by Plaintiff.		
<b>496</b>	Any document listed by Plaintiff.		
<b>497</b>	Any document necessary for rebuttal or impeachment.		
<b>498</b>	Any document identified or produced with discovery responses or disclosure statements.		

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By: /s/ Jeremy Carroll

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2013, I electronically filed the foregoing Defendant's List of Witnesses with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Peter A. Miller, Esq., and Jeffrey Alan Travers, Esq., The Miller Firm, LLC, 108 Railroad Avenue, Orange, Virginia 22960; and Elizabeth Kay Dillon, Esq., Guynn Memmer & Dillon, PC, 415 South College Avenue, Salem, Virginia 24153.

/s/ Jeremy Carroll